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7 Attorneys for Defendants
8 CHURCHILL COUNTY AND
9 BENJAMIN TROTTER

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

10 MICHAEL ERWINE,

11 Plaintiff,

12 vs.

13 CHURCHILL COUNTY, a political subdivision
14 of the State of Nevada; CHURCHILL COUNTY
15 SHERIFF BENJAMIN TROTTER; and DOES 1
16 through 10 inclusive,

16 Defendants.

CASE NO. 3:18-cv-00461-RCJ-CSD

DEFENDANTS' PROPOSED
VERDICT FORMS

18 COME NOW Defendants, CHURCHILL COUNTY and BENJAMIN TROTTER, by and
19 through their attorneys of record, Thorndal Armstrong Delk Balkenbush & Eisinger, and hereby
20 submit their proposed verdict forms (subject to revision depending upon presentation of evidence
21 at trial) as follows:
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 MICHAEL ERWINE,

11 Plaintiff,

12 vs.
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14 CHURCHILL COUNTY, a political subdivision
15 of the State of Nevada; CHURCHILL COUNTY
16 SHERIFF BENJAMIN TROTTER; and DOES 1
through 10 inclusive,

17 Defendants.
18

CASE NO. 3:18-cv-00461-RCJ-CSD

**VERDICT FOR DEFENDANTS ON
PLAINTIFF'S 42 U.S.C. §1983 CLAIM**

19 On Plaintiff's claim brought under 42 U.S.C. §1983 against the Defendants for the
20 alleged deprivation of a liberty interest without adequate process under the Fourteenth
21 Amendment of the United States Constitution and Article 1, §8(5) of the Nevada Constitution,
22 we the jury find in favor of the Defendants and against Plaintiff.
23

24 DATED: _____, 2022.
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27 FOREPERSON
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL ERWINE,

Plaintiff,

vs.

CHURCHILL COUNTY, a political subdivision
of the State of Nevada; CHURCHILL COUNTY
SHERIFF BENJAMIN TROTTER; and DOES 1
through 10 inclusive,

Defendants.

CASE NO. 3:18-cv-00461-RCJ-CSD

**VERDICT FOR DEFENDANTS ON
PLAINTIFF'S DEFAMATION CLAIM**

On Plaintiff's claim against the Defendants for defamation, we the jury find in favor of
the Defendants and against Plaintiff.

Dated: _____, 2022.

FOREPERSON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL ERWINE,

Plaintiff,

vs.

CHURCHILL COUNTY, a political subdivision
of the State of Nevada; CHURCHILL COUNTY
SHERIFF BENJAMIN TROTTER; and DOES 1
through 10 inclusive,

Defendants.

CASE NO. 3:18-cv-00461-RCJ-CSD

**VERDICT FOR DEFENDANTS ON
PLAINTIFF'S TORTIOUS
CONSTRUCTIVE DISCHARGE
CLAIM**

On Plaintiff's claim against the Defendants for tortious constructive discharge, we the
jury find in favor of the Defendants and against Plaintiff.

Dated: _____, 2022.

FOREPERSON

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 MICHAEL ERWINE,

11 Plaintiff,

12 vs.
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14 CHURCHILL COUNTY, a political subdivision
15 of the State of Nevada; CHURCHILL COUNTY
16 SHERIFF BENJAMIN TROTTER; and DOES 1
through 10 inclusive,

17 Defendants.
18

CASE NO. 3:18-cv-00461-RCJ-CSD

**VERDICT FOR DEFENDANTS ON
PLAINTIFF'S INTENTIONAL
INTERFERENCE WITH
PROSPECTIVE ECONOMIC
ADVANTAGE CLAIM**

19 On Plaintiff's claim against the Defendants for intentional interference with prospective
20 economic advantage, we the jury find in favor of the Defendants and against Plaintiff.

21 Dated: _____, 2022.
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FOREPERSON
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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
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10 MICHAEL ERWINE,

11 Plaintiff,

12 vs.

13 CHURCHILL COUNTY, a political subdivision
14 of the State of Nevada; CHURCHILL COUNTY
15 SHERIFF BENJAMIN TROTTER; and DOES 1
16 through 10 inclusive,

17 Defendants.

CASE NO. 3:18-cv-00461-RCJ-CSD

**VERDICT FOR PLAINTIFF ON
STATE TORT CLAIMS**

18 **Defamation Claim**

19 Do you find in favor of Plaintiff and against Defendants on Plaintiff's defamation claim?

20 YES: _____ NO: _____
21

22 **Tortious Constructive Discharge Claim**

23 Do you find in favor of Plaintiff and against Defendants on Plaintiff's tortious discharge
24 claim?

25 YES: _____ NO: _____
26

27 **Intentional Interference with Prospective Economic Advantage**

28 YES: _____ NO: _____

1 Having found in favor of the Plaintiff and against Defendants on one or more of these
2 claims, we the jury assess the total damages as follows:

3 Past emotional distress \$ _____ .00

4 Past lost wages \$ _____ .00

5 TOTAL: \$ _____ .00

6 Dated: _____, 2022.

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10 _____
FOREPERSON

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14 DATED this 11th day of February, 2022.

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16 THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER

17
18 By: _____

Katherine F. Parks, Esq.
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(775) 786-2882
kfp@thorndal.com
Attorneys for Defendants
Churchill County and
Benjamin Trotter

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER, and that on this date I caused the foregoing **DEFENDANTS'**

PROPOSED VERDICT FORMS to be served on all parties to this action by:

_____ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

☒ United States District Court, District of Nevada CM/ ECF (Electronic Case Filing)

_____ personal delivery

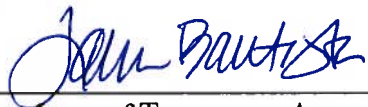
_____ facsimile (fax)

_____ Federal Express/UPS or other overnight delivery

fully addressed as follows:

Luke Busby, Esq.
316 California Ave., #82
Reno, NV 89509
Attorney for Plaintiff

DATED this 11 day of February, 2022.



An employee of THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER